



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NS:TH  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 30, 2020

By ECF

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter in connection with the judgment to be filed as to defendant Keith Raniere in the above-captioned case. Below is a table indicating how counts in the superseding indictment correlate with those submitted to the jury.

<u>Counts in Superseding Indictment</u>	<u>Counts in Jury Charge and Verdict Sheet</u>
One (Racketeering Conspiracy)	One
Two (Racketeering)	Two
Three (Sexual Exploitation of a Child)	[Not included]
Four (Sexual Exploitation of a Child)	[Not included]
Five (Possession of Child Pornography)	[Not included]
Six (Forced Labor Conspiracy)	Three
Seven (Wire Fraud Conspiracy)	Four

<u>Counts in Superseding Indictment</u>	<u>Counts in Jury Charge and Verdict Sheet</u>
Eight (Sex Trafficking Conspiracy)	Five
Nine (Sex Trafficking – Jane Doe 5)	Six
Ten (Attempted Sex Trafficking – Jane Doe 8)	Seven
Eleven (Conspiracy to Commit Identity Theft – Jane Doe 7)	[Not included]

Respectfully submitted,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/ Tanya Hajjar  
Tanya Hajjar  
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cc: Counsel of Record (by ECF)